

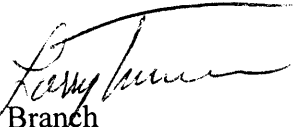


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 29 2002

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Memorandum

From: Larry Turner, Ph. D.   
Environmental Field Branch  
Field and External Affairs Division

To: Arthur-Jean Williams, Chief  
Environmental Field Branch  
Field and External Affairs Division

Subject: Effects Determination for Diazinon for Pacific Anadromous Salmonids

I reviewed data and other information for diazinon, a pesticide named by the Washington Toxics Coalition (WTC) and included in the court order for 'effects determinations' and potential consultation with the National Marine Fisheries Service. An Interim Reregistration Eligibility Decision (IRED) document was issued for diazinon in October, 2002 and is currently available for public comment. This IRED summarizes the ecological risks of diazinon; considerably more information is in the Environmental Risk Assessment for Diazinon developed in October, 2000, and I have used these discussions as the primary starting point for my analysis. To develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead, I have adapted the more general findings of the Environmental Risk Assessment to the various ESUs of these salmon and steelhead. I have also sought other information since that Environmental Risk Assessment was completed. The new information is supplemental and does not change the overall assessment for diazinon.

Based on the RED and additional considerations indicated in my analysis and other attached or referenced materials, I conclude that the use of diazinon may affect, but is not likely to adversely affect four salmon and steelhead Evolutionarily Significant Units (ESUs), and may affect the other 22 salmon and steelhead ESUs. There is considerable uncertainty about the future use of diazinon because residential uses are cancelled and being phased out, and there are a number of changes, including deletion of certain uses, for the agricultural uses. There is little that OPP can do under FIFRA, as I understand it, with regard to protective measures for the residential uses, beyond the cancellation and phase out. For the agricultural uses that will remain, I propose that OPP work with the Pacific States to determine how to limit the aquatic exposure of diazinon

Internet Address (URL) • <http://www.epa.gov>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

to no more than 0.1 ppb, which I consider to be a no-effect level. A buffer between diazinon applications and aquatic habitats would seem to be the most efficacious protection, but the States may have alternatives that would be equivalently protective. I recommend working with the States and NMFS to determine the appropriate size of buffers or the nature of other methods of protection.